


**STATE OF NEW YORK)**  
**) SS.:**  
**COUNTY OF DUTCHESS)**

The undersigned, being duly and individually sworn, depose under penalty of perjury and say:

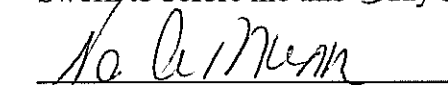
1. We are the current and former employees of GHT Petroleum, Inc. and Golden Touch Gas & Food, Inc.
2. We have read the attached Notice of Lawsuit with Opportunity to Join, which has been proposed in the matter entitled Mohamed Elmeshad, as Plaintiff v. GHT Petroleum, Inc., Golden Touch Gas & Food, Inc., Tarlok Singh, and Haridner Singh, as Defendants, which is pending in the United States District Court for the Southern District of New York under docket number 07-CIV-5990.
3. We understand that the purpose of the Notice is to advise us of the right to join Mr. Elmeshad in suing the defendants for purported overtime wages which allegedly were not paid to us while we were in the employ of the defendants.
4. We also understand that we have the right to opt-in as Plaintiffs in that action, or to refuse to opt-in and not join the lawsuit as Plaintiffs.
5. Under no circumstances will we join in any action against the defendants arising from the defendants purported failure to pay us overtime wages, nor will we agree to sign the attached Notice of Lawsuit With Opportunity To Join, or any other similar notice which seeks to have us join Mr. Elmeshad in pursuing the foregoing lawsuit against the defendants.

**GHT PETROLEUM INC. EMPLOYEES**


 (signature)

Haison S. Ghazali  
170 Clove Branch Road, Apt. 22  
Hopewell Junction, NY 12533

Sworn to before me this 23 day of October, 2007

  
Notary Public

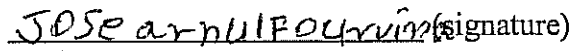
NANCI A. MUNOZ  
Notary Public, State Of New York  
Reg. No. 01MU5073234  
Qualified In Dutchess County  
Commission Expires Feb. 18, 2011

 (signature)  
Angeline Nieisen  
560 Rt. 82  
Hopewell Junction, NY 12533

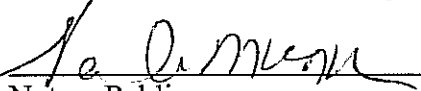
Sworn to before me this <sup>2nd</sup> day of Oct., 2007

  
Notary Public

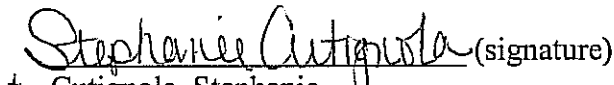
DEBBI L. COCUZZA  
NOTARY PUBLIC, State of New York  
01C05054518  
Qualified in Dutchess County  
Commission Expires 1/16/ 2010

 (signature)  
Urbina, Jose Arnulfo  
not known


Sworn to before me this <sup>22nd</sup> day of October, 2007

  
Notary Public

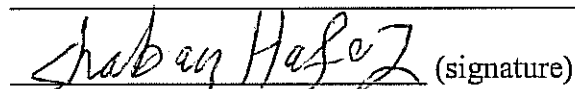
NANCI A. MUNOZ  
Notary Public, State Of New York  
Reg. No. 01MU5073234  
Qualified In Dutchess County  
Commission Expires Feb. 18, 2011

 (signature)  
+ Cutignola, Stephanie  
37 Pine Ridge Drive  
Hopewell Junction, NY 12533

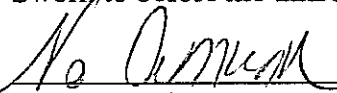
Sworn to before me this <sup>22nd</sup> day of October, 2007

  
Notary Public

NANCI A. MUNOZ  
Notary Public, State Of New York  
Reg. No. 01MU5073234  
Qualified In Dutchess County  
Commission Expires Feb. 18, 2011

 (signature)  
Abdel-Hafez, Shaban, R.  
631 S. Geddes Street  
Syracuse, NY 13204

Sworn to before me this <sup>23rd</sup> day of October, 2007

  
Notary Public

NANCI A. MUNOZ  
Notary Public, State Of New York  
Reg. No. 01MU5073234  
Qualified In Dutchess County  
Commission Expires Feb. 18, 2011

\_\_\_\_\_  
(signature)

Martinez, Angeld, D.  
193 Route 82  
Fishkill, NY 12524

Sworn to before me this     day of     , 2007

\_\_\_\_\_  
Notary Public

\_\_\_\_\_  
(signature)

Kosilla, Jessica Ann  
not known

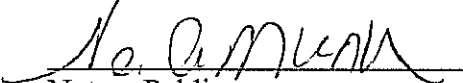
Sworn to before me this     day of     , 2007

\_\_\_\_\_  
Notary Public

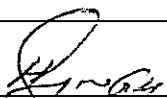
 (signature)

Gasanjit Gogi  
5111 Princess Cr  
Wappinger Falls, NY 12590

Sworn to before me this 22 day of October, 2007


  
Notary Public

NANCI A. MUNOZ  
Notary Public, State Of New York  
Reg. No. 01MU5073234  
Qualified In Dutchess County  
Commission Expires Feb. 18, 2011

 (signature)

Singh, Harinder  
1054 Main Street, 2F  
Fishkill, NY 12524

Sworn to before me this 5<sup>th</sup> day of October, 2007

  
Notary Public

NANCI A. MUNOZ  
Notary Public, State Of New York  
Reg. No. 01MU5073234  
Qualified In Dutchess County  
Commission Expires Feb. 18, 2011

Tarlok Singh (signature)

Singh, Tarlok  
1054 Main Street, 2F  
Fishkill, NY 12524

Sworn to before me this 2nd day of October, 2007

Annemarie Forneris  
Notary Public

ANNEMARIE FORNERIS  
Notary Public, State of New York  
Certified in Orange County  
Reg. No. 01FO4985929  
Commission Expires 9/2/2009

**GOLDEN TOUCH GAS & FOODS EMPLOYEES**

Jarnail Singh (signature)  
Singh, Jarnail  
253 Broadway  
Newburgh, NY 12550

Sworn to before me this 22 day of October, 2007

Nanci A. Munoz  
Notary Public

NANCI A. MUNOZ  
Notary Public, State Of New York  
Reg. No. 01MU5073234  
Qualified In Dutchess County  
Commission Expires Feb. 18, 2011

Surinder Singh (signature)  
Singh, Surinder  
65 Winona Avenue  
Newburgh, NY 12550

Sworn to before me this 22 day of October, 2007

Nanci A. Munoz  
Notary Public

NANCI A. MUNOZ  
Notary Public, State Of New York  
Reg. No. 01MU5073234  
Qualified In Dutchess County  
Commission Expires Feb. 18, 2011

Prem K. Aspal-Shetty (signature)  
Prem, Aspal-Shetty  
42-52 Union Street, 401  
Flushing, NY 11355

Sworn to before me this 2nd day of October, 2007

Annemarie Forneris  
Notary Public

ANNEMARIE FORNERIS  
Notary Public, State of New York  
Certified in Orange County  
Reg. No. 01FO4985929  
Commission Expires 9/3/2009

Orlando Diaz (signature)  
Diaz, Orlando  
476 Broadway, Apt. 2  
Newburgh, NY 12550

Sworn to before me this 2nd day of October, 2007

Annemarie Forneris  
Notary Public

ANNEMARIE FORNERIS  
Notary Public, State of New York  
Certified in Orange County  
Reg. No. 01FO4985929  
Commission Expires 9/3/2009

Parminder Kaur (signature)  
Kaur, Parminder  
1054 Main Street, 2F  
Fishkill, NY 12524

Sworn to before me this 22 day of October, 2007

Nanci A. Munoz  
Notary Public

NANCI A. MUNOZ  
Notary Public, State Of New York  
Reg. No. 01MU5073234  
Qualified In Dutchess County  
Commission Expires Feb. 18, 2011

Harjinder Singh (signature)  
Singh, Harjinder  
103 Paola Court  
Plainview, NY 11803

Sworn to before me this 23 day of October, 2007

Nanci A. Munoz  
Notary Public

NANCI A. MUNOZ  
Notary Public, State Of New York  
Reg. No. 01MU5073234  
Qualified In Dutchess County  
Commission Expires Feb. 18, 2011

Tarlock Singh (signature)  
Singh, Tarlock  
1054 Main Street, 2F  
Fishkill, NY 12524

Sworn to before me this 22<sup>nd</sup> day of October, 2007

Annemarie Forneris  
Notary Public

ANNEMARIE FORNERIS  
Notary Public, State of New York  
Certified in Orange County  
Reg. No. 01FO4985929  
Commission Expires 9/30/2009

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**MOHAMED ELMESHAD, individually  
and on behalf of others similarly situated,**

**Plaintiffs,**

**v.**

**GHT PETROLEUM, INC., GOLDEN TOUCH  
GAS & FOOD, INC., TARLOK SINGH,  
and HARINDER SINGH,**

**Defendants.**

**07-CIV-5990  
(CLB)(LMS)**

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**NOTICE OF LAWSUIT WITH OPPORTUNITY TO JOIN**

This notice is directed to individual employees of GHT Petroleum, Inc., and Golden Touch Gas & Food, Inc., Tarlok Singh, and Harinder Singh, who worked as cashiers at any point from [date GHT/Golden Touch began operation] to the present and who may have worked over 40 hours in one or more weeks without being paid time and one-half overtime premium pay or the prevailing New York State minimum wage.

**1) INTRODUCTION TO THE CASE**

This notice is to inform you that a lawsuit is pending against the defendants, GHT Petroleum, Inc., and Golden Touch Gas & Food, Inc., Tarlok Singh, and Harinder Singh, in the U.S. District Court for the Southern District of New York. This lawsuit is brought to make a claim that the defendants did not pay all eligible employees "time and one-half" or overtime for all hours worked in excess of 40 hours in a week or the prevailing minimum wage in New York State. The lawsuit makes claims that the defendants must pay back pay and an equal amount as liquidated damages as well as costs and attorneys' fees to such employees. If you worked more than 40 hours in some weeks from [date GHT/Golden Touch began operating] to the present, you may consider joining the case.

Any agreement you may have previously signed with GHT Petroleum, Inc., and Golden Touch Gas & Food, Inc., Tarlok Singh, and Harinder Singh may not prevent you from joining this lawsuit because employees' rights under the federal Fair Labor

Standards Act may not be waived by any such agreement.

The fact that GHT Petroleum, Inc., and Golden Touch Gas & Food, Inc., Tarlok Singh, and Harinder Singh may not have kept records of your hours of work does not bar your joining this lawsuit and will not be a bar to any individual's claims.

If you are currently employed by GHT Petroleum, Inc., Golden Touch Gas & Food, Inc., Tarlok Singh, or Harinder Singh, your participation in this collective action will have NO IMPACT WHATSOEVER on your employment. Both state and federal law prohibit any type of discrimination or retaliation if you choose to participate in this action or decide not to participate.

**2) TO JOIN THE CASE AND BE REPRESENTED BY PLAINTIFF'S COUNSEL**

If you worked for defendants as a cashier and you worked in excess of 40 hours in any week and were not paid time and one-half for all or some overtime hours or were not paid the prevailing New York State minimum wage and you wish to be a plaintiff in the lawsuit and be represented by plaintiff's counsel, you **must** sign the form attached and return it to the lawyers who are representing the plaintiffs no later than [60 days after the date of this notice]. If you sign and return the attached form, your interests will be represented by the Getman Law Office.

The lawyer's address is:

Matt Dunn  
Getman Law Office  
9 Paradies Lane  
New Paltz, NY 12561  
Phone: (845) 255-9370  
Fax: (845) 255-8649  
website: <http://getmanlaw.com>

You may call the lawyer's number above if you wish to have further information about the case or if you need more help in joining the lawsuit. Plaintiffs' lawyers will not charge any fee directly to you for representing you, though they may seek such fee from the defendant if the plaintiffs win the case, and they will receive a fee taken from any settlement or judgment as specified on the attached consent to sue.



The defendants are prohibited by law from taking any retaliatory action against any person, including a current worker, who joins this case. The defendants have denied the allegations of the case and raised various defenses. No decision by the Court has yet been made on the case.

**3) TO JOIN THE SUIT, BUT NOT BE REPRESENTED BY THE PLAINTIFFS**

You also have the right to have your own lawyer or to represent yourself in the case. You must contact such a lawyer or file the appropriate documents on your own to do so. The address of the Court is: U.S. District Court, 300 Quarropas St., White Plains, NY 10601.

**4) TO STAY OUT OF THE LAWSUIT**

If you do not wish to be part of the lawsuit, you do not need to do anything. If you do not join the lawsuit, you will not be part of the case in any way and will not be bound by or affected by the result (whether favorable or unfavorable). Your decision not to join this case will not affect your right to bring a similar case on your own at a future time. However, claims under the Fair Labor Standards Act must be brought within 2 years, unless the employer's violation of the law was "willful," in which case the claim must be brought within 3 years. Claims under New York State Labor Law must be brought within 6 years.

Dated: [insert date of notice]

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Matt Dunn (MD1103 )  
Getman Law Office  
9 Paradies Lane  
New Paltz, NY 12561  
(845) 255-9370  
Attorneys for Plaintiffs

**THIS NOTICE AND ITS CONTENTS HAVE BEEN AUTHORIZED BY THE  
FEDERAL DISTRICT COURT, HONORABLE CHARLES L. BRIEANT,  
UNITED STATES DISTRICT JUDGE. THE COURT HAS TAKEN NO  
POSITION IN THIS CASE REGARDING THE MERITS OF THE PLAINTIFF'S  
CLAIMS OR OF THE DEFENDANTS' DEFENSES.**

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

MOHAMED ELMESHAD, individually  
and on behalf of others similarly situated,

Plaintiffs,

v.

GHT PETROLEUM, INC., GOLDEN TOUCH  
GAS & FOOD, INC., TARLOK SINGH,  
and HARINDER SINGH,

Defendants.

07-CIV-5990  
(CLB)(LMS)

CONSENT TO SUE

I, hereby consent to be a plaintiff in the Fair Labor Standards Act case named *Elmeshad v. GHT Petroleum, Inc., Golden Touch Gas & Food, Inc., Tarlok Singh, and Harinder Singh*. I hereby consent to the bringing of any claims I may have under the Fair Labor Standards Act or New York State Labor Law (for unpaid overtime, liquidated damages, minimum wage violations, attorneys' fees, costs and other relief) against the defendants.

I authorize the Getman Law Office, its successors and assigns, to represent me in this case.

By signing and returning this consent to sue, I understand that I will be represented by the Getman Law Office without prepayment of costs or attorneys' fees. I understand that if plaintiffs are successful, costs expended by attorneys on my behalf will be deducted from my settlement or judgment first. I understand that the Getman Law Office may petition the court for an award of fees and costs to be paid by defendant on my behalf. I understand that the fees retained by the attorneys will be either the amount received from the defendant or 1/3 of my gross settlement or judgment amount, whichever is greater.

Dated: \_\_\_\_\_

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Address: \_\_\_\_\_